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To: CEQA Guidelines
Subject: Comments on proposed changes to CEQA Appendix G

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The current proposed changes include incorporating sections and significance thresholds into other sections. In particular, the current Geology section thresholds, along with other section thresholds, are proposed to be incorporated into other sections, predominantly Open Space, Managed Resources and Working Landscapes. However, the Open Space section appears to be a dumping ground for various unrelated thresholds (e.g., farmland, habitat, paleontological resources). This approach will confuse readers attempting to locate specific topics and thresholds. For example, impacts from the Geology and Soils section are not limited to “open space.” Indeed, the more severe impacts, especially from seismic effects, are related to developed environments (e.g., occupied structures). The primary problem with this approach of creating an Open Space section is that it separates individual thresholds from the relevant environmental settings in sections.

A simpler approach of changes and consolidations using the current Appendix G structure would be more effective. This would retain most of the current topic groupings as is (Geology, Hydrology, Land Use, etc.) with the following changes keyed to the current and proposed Appendix G:

- Aesthetics – Use the proposed changes.
- Ag & Forest – Retain this section but use the revised and consolidated thresholds in the proposed Open Space section, Thresholds (b) (i) thru (vi). This will return the thresholds to a section with the relevant environmental setting.
- Air Quality – Use the proposed changes.
- Biological Resources – Use the proposed changes.
- Cultural Resources – Retain/restore this section but use the proposed changes, with the following exception. Send the thresholds for the Paleontological Resources section to the Geology section since the geologic setting of a site controls whether paleontological resources could be present.
- Geology and Soils – Retain this section in the current Appendix G form with the following changes:
 - Seismic shaking – This threshold is currently Geology (a)(ii) but is missing from anywhere in the proposed changes and thus does not address the primary seismic impact of seismic shaking to proposed structures. This needs to be restored.
 - Consolidate Thresholds (a)(iii) and (a)(iv) into one threshold: Seismically induced ground failures, including liquefaction, landslides, or lateral spreading?

- Revise/consolidate Threshold (c) to: Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in or be subjected to non-seismically induced on- or offsite landslides, subsidence, collapse, expansive soils, or corrosive soils?
- Note that the existing Threshold (d) would be incorporated into Threshold (c).
- The existing Threshold (e), septic systems and alternate wastewater disposal systems is missing from the proposed Appendix G thresholds. This potential impact does occur and should be retained.
- Move the Paleontological Resources and Mineral Resources thresholds to this Geology section. The Geology environmental setting is relevant to paleontology and mineral resources.
- Energy – This is a new section and looks acceptable.
- Greenhouse Gas Emissions – No changes were proposed.
- Hazards and Hazardous Materials:
 - The consolidation of the two airport thresholds together (e) and (f) is logical.
 - The proposed Threshold (h) is a mix of unrelated topics. All but wildfires are elements addressed in other sections and thresholds; this duplicative threshold should be simplified back the wildfire threshold only.
- Hydrology and Water Quality – Some of the proposed changes are effective, with the following comments and exceptions:
 - The Open Space section duplicates some of the Hydrology thresholds. Recommend retaining the proposed Hydrology section changes and deleting the duplications in the Open Spaces section, as identified further below in the Open Spaces section. This is because the certain specific thresholds are related to water issues and not limited to open space.
 - The current Appendix G thresholds for 100-year flood zones should be restored by consolidating Thresholds (g) and (h) into one threshold: Place housing or other structures within a 100-year flood hazard area, as mapped on a federal Flood Insurance Map or other flood hazard delineation map, that could be damaged or impede redirect flood flows?
 - The current Appendix G Threshold (i) on dam and levee failure and (j) on seiches, tsunamis, or mudflows are not adequately addressed in the Open Space section. Considering that these impacts are not limited to Open Space and are of equal concern

to developed areas, I recommend retaining these thresholds in the Hydrology section and combining them into: Expose people or structures to a significant risk of loss, injury, or death involving flooding or inundation from the failure of a dam, or levee, seiches, tsunamis, or mudflows?

- Land Use and Planning - Use the proposed changes.
- Mineral Resources – As noted above, these thresholds would be incorporated into the Geology section.
- Noise - Use the proposed changes.
- Open Space, Managed Resources and Working Landscapes – As discussed above, this proposed section is a dumping ground for various unrelated thresholds that separates those thresholds from their relevant environmental settings. After the various thresholds discussed above are returned back to their relevant sections, only a few thresholds would remain that could easily be incorporated back into other relevant sections, and would completely eliminate the need for this new Open Space section. The remaining thresholds to be moved are listed below:
 - Threshold (a) (i) should be moved to the Biology section, where the relevant environmental setting discussion would be.
 - Threshold (a)(ii) Waters of the State, along with Waters of the US, should be incorporated into the Biology section since the biological conditions, along with hydrology conditions, define those waters. Alternately, this threshold could be incorporated into the Hydrology section.
 - Threshold (d)(ii) wildfires – This threshold duplicates the wildfire threshold in the Hazards section, which is the more appropriate place. Delete this threshold from Open Space.
 - Once all of the other thresholds are moved back to their more relevant sections, Threshold (c) Recreation is the only threshold left. Therefore, if the concept is to reduce sections, then simply send the recreation threshold to the more relevant Land Use section.
- Population and Housing - Use the proposed changes.
- Public Services – There are no proposed changes.
- Recreation – This can easily be incorporated into the relevant Land Use section.
- Transportation - Use the proposed changes.
- Utilities and Service Systems - Use the proposed changes.

- Wildfire – This section contains thresholds that belong in the Hazards section; there is no need to create a new and additional stand-alone section for this topic. Recommend the following changes:
 - Threshold (a) emergency response or evacuation plans: wildfires are not the only event that can interfere with these plans. The construction of a project can also interfere with emergency plans. This needs to be a stand-alone threshold in the Hazards section.
 - Thresholds (b), (c), and (d): As demonstrated by the Lake County wildfires, wildfire behaviors are difficult if not impossible to predict. These three thresholds request detailed information that would be exceedingly difficult to develop and would have a high probability of not occurring as predicted. Wildfires are better addressed as noted above in the Hazards section; these three thresholds should be deleted in their entirety.